

BLANK  **ROME** LLP
COUNSELORS AT LAW

Phone: (302) 425-6467
Fax: (302) 425-6464
Email: dube@blankrome.com

October 3, 2006

VIA CMF AND HAND DELIVERY

The Honorable Joseph J. Farnan, Jr.
United States District Court
for the District of Delaware
844 King Street
Wilmington, DE 19801

Re: • *Magten Asset Management Corp. and Law Debenture Trust Co. v. Northwestern Corp.*; C.A. No. 04-1494-JJF; and
• *Magten Asset Management Corp. v. Mike J. Hanson and Ernie J. Kindt*; C.A. No. 05-0499-JJF

Your Honor:

We write on behalf of Magten Asset Management Corporation and Law Debenture Trust Company of New York, the Plaintiffs in the above-captioned actions. On September 29, 2006, the Court entered its Orders denying Northwestern's Motions for Protective Orders (D.I. 86 in 04-1494; D.I. 115 in 05-499). Accordingly, Plaintiffs plan to proceed with discovery, including the discovery previously stayed by operation of Local Rule 30.2.

Because many of the dates originally proposed for the scheduling orders have been overtaken during consideration of these motions, Plaintiffs respectfully request that the Court schedule a conference in order to set or reset dates, as applicable, for finalizing a scheduling order in the above cases. We will, of course, seek to discuss suggested dates with the other parties in advance of the requested conference.

Counsel is available by telephone, should the Court have any questions.

Respectfully submitted,



Dale R. Dubé
I.D. No. 2863

- and -



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Bonnie Steingart
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, NY 10004

DRD/pb

cc: Clerk of Court (via hand delivery)
John E. James, Esquire (courtesy copy, via hand delivery)
Bijan Amini, Esquire (via e-mail and Federal Express)
Jesse H. Austin, III, Esquire (via e-mail and Federal Express)
Kimberly A. Beatty, Esquire (via e-mail and Federal Express)
Philip Bentley, Esquire (via e-mail and Federal Express)
John W. Brewer, Esquire
Rebecca L. Butcher, Esquire (via e-mail and hand delivery)
Brenda Cooke, Esquire
Victoria W. Counihan, Esquire (via e-mail and hand delivery)
Amanda Darwin, Esquire (via e-mail and Federal Express)
Robert J. Dehney, Esquire (via e-mail and hand delivery)
Nancy E. Delaney, Esquire (via e-mail and Federal Express)
Karol K. Denniston, Esquire (via e-mail and Federal Express)
Bonnie Glantz Fatell, Esquire
Dennis E. Glazer, Esquire (via e-mail and Federal Express)
Miriam K. Harwood, Esquire (via e-mail and Federal Express)
David A. Jenkins, Esquire (via e-mail and hand delivery)
Stanley T. Kaleczyc, Esquire (via e-mail and Federal Express)
Gary L. Kaplan, Esquire
Denise Seastone Kraft, Esquire (via e-mail and hand delivery)
Adam G. Landis, Esquire (via e-mail and hand delivery)
Dennis A. Meloro, Esquire (via e-mail and hand delivery)
Curtis S. Miller, Esquire (via e-mail and hand delivery)
Kathleen M. Miller, Esquire (via e-mail and hand delivery)
Kerri K. Mumford, Esquire (via e-mail and hand delivery)
Jordanna L. Nadritch, Esquire
Joanna I. Palacios, Esquire



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Joseph D. Pizzurro, Esquire (via e-mail and Federal Express)
Steven J. Reisman, Esquire (via e-mail and Federal Express)
Avery Samet, Esquire (via e-mail and Federal Express)
John V. Snellings, Esquire (via e-mail and Federal Express)
Paul Spagnoletti, Esquire (via e-mail and Federal Express)
Matthew J. Williams, Esquire (via e-mail and Federal Express)